



**KALISPELL REGIONAL
HEALTHCARE**

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May 24, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly

Dear Chairman Pai, Commissioner Clyburn, and Commissioner O'Rielly:

On behalf of Kalispell Regional Healthcare (KRH), we appreciate an opportunity to respond to this Public Notice¹ seeking recommendations about improvements for broadband-enabled health care solutions.

We are aware of a letter received by the Commission on matters related to issues rural providers like KRH currently face, from U.S. Senator Steve Daines of Montana. Sen. Daines's letter of December 18, 2015, encouraged support for a rule change by the Commission to make internal wireless connections an available option as part of the Universal Service rural healthcare program.

As the Commission considers comments and data regarding actions to hasten adoption and accessibility of broadband-enabled healthcare solutions and advanced technologies, we hope the Commission reviews Sen. Daines's recommendations on this topic. Enabling internal wireless connections for the nation's small rural healthcare facilities would expand and improve care for rural Americans, and promote greater efficiency and cost savings, creating a win-win for both patients and physicians.

Sincerely,

Rebecca Manna
Kalispell Regional Healthcare

Attachment: Daines Letter 12/18/2015

¹ See "Public Notice: FCC Seeks Comment And Data On Actions To Accelerate Adoption And Accessibility Of Broadband-Enabled Health Care Solutions And Advanced Technologies," released April 24, 2017 (FCC 17-46) available at <https://ecfsapi.fcc.gov/file/04242338715026/FCC-17-46A1.pdf>.

STEVE DAINES
MONTANA

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United States Senate

COMMITTEES
APPROPRIATIONS
COMMERCE, SCIENCE AND
TRANSPORTATION
ENERGY AND NATURAL
RESOURCES
INDIAN AFFAIRS

December 18, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai,
and Commissioner O'Rielly:

Thank you for your recent visits to Montana. I am pleased that the Chairman, Commissioners Rosenworcel, Pai, and O'Rielly had an opportunity to see and hear firsthand about the unique challenges that our rural state faces in the deployment of 21st century communications technologies.

Today, access to high-speed broadband is critical to advance education, civic participation, and economic development. Broadband is also a key component in the delivery of modern quality healthcare. Given our state's vast geography, telemedicine is essential in expanding access to health services, promoting health education, and reducing the cost of healthcare while increasing efficiency and effectiveness.

With few full-service acute care hospitals, many Montanans living in rural and frontier areas of the state rely on smaller primary care, critical access hospitals that provide primarily routine medical/surgical care, with few specialty services. And these small primary facilities, in turn, through telemedicine, rely on regional health care networks for access to board certified, sub-specialty physicians, laboratory services, and various tele-health services.

The FCC's Universal Service programs have played a vital role in enhancing access to high-speed broadband networks in rural America, and specifically in providing the vital communications links necessary to connect various health care facilities across my state. To leverage the power of these broadband data links, however, small rural health care facilities must have adequate and functional internal connections on premise to deliver the value of telemedicine for quality healthcare.

I understand that today, the Commission's Universal Service program does not support internal connections in healthcare institutions, that include wireless and related communications technologies that provide internal connections. The genesis of that decision I believe occurred in the 1990s, prior to the massive innovation and investment that has occurred in the nation's wireless communications networks and technologies.

I also understand that in 2012, the FCC considered but declined to change its approach regarding support for internal connections. At the time, however, the American Telemedicine

Association (ATA) demonstrated that changes to the Commission's rural healthcare program could "encourage building onto and expanding use of existing commercially available wireless services as well as integrating such services with landline networks...[to] greatly reduce the cost of connectivity." As the ATA noted, the use of wireless connectivity could greatly benefit patients in a hospital. They highlighted for the Commission how:

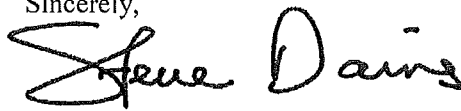
"[n]ew hospital-based wireless medical monitoring devices allow ubiquitous access from patients to nursing stations, avoiding the tangle of wires common to patient rooms. Such devices also allow vital sign monitors to go with the patient from surgery to post-op, to radiology, etc. rather than requiring patients to be unplugged and re-plugged in at every stop. In addition, wireless connectivity to cell phones and laptops allows physicians to stay connected with their hospitalized patients when the physician is not in the patient's room or even when the physician is outside the hospital."

Since then, innovation in mobile broadband technologies and wireless health have greatly accelerated as reliability for wireless access and mobile bandwidth speeds have increased exponentially. As the cost curve for deployment of wireless internal connection infrastructure technology has dropped, this marketplace reality now enables the FCC to introduce an additional cost savings measure into the existing Universal Service program.

A relatively minor change in the Commission's rules to enable wireless internal connections for the nation's small rural healthcare facilities would introduce the double benefit of expanding choice in the deployment of 21st century networks and facilities to improve the delivery of healthcare for rural Americans, and promote greater efficiency and connectivity cost savings in this important Universal Service program.

I encourage the Commission to initiate a proceeding to examine a rule change that makes wireless internal connections an available option as part of the Universal Service rural healthcare program.

Sincerely,

A handwritten signature in black ink that reads "Steve Daines". The signature is fluid and cursive, with the first name "Steve" and last name "Daines" clearly legible.

Steve Daines
United States Senator